

# EXHIBIT E

**DAVID GOODRICH, ET AL. vs. FISHER-PRICE, INC.**  
**Paul Gaudreau, Jr. on 11/28/2017**

1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE NORTHERN DISTRICT OF GEORGIA  
3 ATLANTA DIVISION  
4 DAVID GOODRICH and  
5 COURTNEY GOODRICH,  
6 Individually and as Next Friends of  
7 ASHER LUKE GOODRICH, a minor,  
8 Plaintiffs,  
9 vs. CIVIL ACTION NO. 1:16-CV-03116-TWT  
10 FISHER-PRICE, INC.,  
11 Defendant.

12 -----x

13

14 DEPOSITION OF  
15 PAUL GAUDREAU, JR.

16 Tuesday, November 28, 2017

17 10:12 a.m.

18 Nelson Mullins Riley & Scarborough, LLP  
19 One Post Office Square  
20 Boston, Massachusetts 02109

21  
22 Laurie K. Langer, RPR  
23  
24  
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1 Q. Do you know -- take the word "sold" out because  
2 that's -- who knows.

3 Do you know when it was first produced for the  
4 marketplace?

5 A. No, I don't know the exact date.

6 Q. Do you know what year?

7 A. No.

8 Q. We do know that it was tested by SGS, by the  
9 Bureau of Veritas, and others prior to production in  
10 2009; correct?

11 A. Right. That we know.

12 Q. And it was tested to the crib and bassinet  
13 standard; --

14 A. Yes.

15 Q. -- correct?

16 And it was tested to F2194-07; correct?

17 A. Yes.

18 Q. And it was found to be compliant with that  
19 standard; correct?

20 A. At that time.

21 Q. At that time. And then the F2194-07, which I do  
22 not believe you have ever seen; correct?

23 A. Yes.

24 Q. Was modified to some extent. You don't know how  
25 much, but was modified in 2010?

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1 A. Yes.

2 Q. And the product then, the, the product then  
3 complied with the 2010 standard, do you know anything  
4 about any subsequent standards from F2194-10?

5 A. No.

6 Q. Do you have any understanding of what was going  
7 on between the CPSC on the one hand and ASTM on the  
8 other with respect to development of standards for  
9 incline sleep products?

10 A. No.

11 Q. You understand, do you not, that the Rock 'n Play  
12 sleeper does in fact comply with F3118-15?

13 A. Yes.

14 Q. And that is the standard that we have said is  
15 specific to incline sleep products?

16 A. Yes.

17 Q. In Exhibit 2 and 3, you have the statement,  
18 "after reviewing the case documents, and the sleeper in  
19 question, it appears that Fisher-Price did not follow  
20 the above protocol."

21 What did Fisher-Price not follow?

22 A. It is my opinion that they did not follow the  
23 academy -- American Academy of Pediatrics guidelines.

24 Q. Do you know if the American Academy of Pediatric  
25 guidelines were in force and effect with respect to any